

Seda D. Welthe
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Bank Fraud)

From on or about July 3, 2019 to on or about July 18, 2019, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

JAQUELEEN VALDEZ,

knowingly and intentionally executed, and attempted to execute, a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain the money, funds, or other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises.

In violation of Title 18, United States Code, Sections 1344 and 2.

ATTACHMENT B

I, Francis Sullivan, am a Special Agent with the United States Secret Service. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, photographs, and evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At all times relevant to this Complaint:
 - a. Company-1 was a corporation headquartered in New York, New York;
 - b. Victim Bank-1 and Victim Bank-2 were both federally regulated national banking associations, the accounts of which were insured by the Federal Deposit Insurance Corporation, rendering each of them a “financial institution” as that term is defined in Title 18, United States Code, Section 2;
 - c. Bank Account-1 was serviced by Victim Bank-1;
 - d. Bank Account-2 was serviced by Victim Bank-2.
2. From on or about July 3, 2019 to on or about July 18, 2019, VALDEZ executed a scheme to defraud Victim Bank-2 by using a fraudulent identification in an attempt to gain unauthorized access to funds she deposited into Bank Account-2 under false pretenses.
3. On or about August 1, 2019, law enforcement initiated an investigation after an accountholder at Victim Bank-1 reported that unauthorized withdrawals had been taken from his account, Bank Account-1.
4. Bank surveillance shows that on or about July 3, 2019, an individual later identified as VALDEZ entered a branch of Victim Bank-2 located in North Bergen, New Jersey. Purporting to be an authorized representative of Company-1, VALDEZ used a fraudulent driver’s license in the name of a real person and the tax identification number of Company-1 to open Bank Account-2 in the name of Company-1.

5. At approximately 1:50 p.m. on or about July 18, 2019, Individual-1 entered a branch of Victim Bank-1 located in Hoboken, New Jersey. Purporting to be the authorized accountholder of Bank Account-1, Individual-1 presented a fraudulent identification and caused a cashier's check made payable to Company-1 in the amount of approximately \$247,455.83 to be issued from Bank Account-1 (the "Fraudulent Withdrawal").

6. About three hours after the Fraudulent Withdrawal, VALDEZ entered the North Bergen branch of Victim Bank-2 and deposited the cashier's check that Individual-1 had obtained from the Fraudulent Withdrawal into Company-1's fraudulent account at Victim Bank-2.¹ After VALDEZ deposited the cashier's check, she contacted the bank employee who had assisted her in opening the account and requested that the hold be lifted in order to release the funds.

7. Law enforcement subsequently identified VALDEZ as the individual depicted in Victim Bank-2's surveillance footage from the July 3 and July 18 transactions.

¹ The funds were never released to VALDEZ because a hold was placed on the check for suspected fraud on or about July 19, 2019.